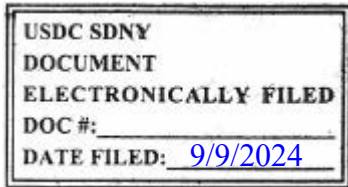


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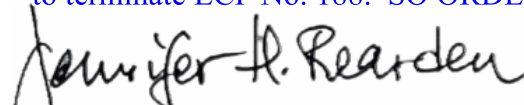


September 6, 2024

VIA ECF AND ELECTRONIC MAIL

Hon. Jennifer H. Rearden
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 188. SO ORDERED.


Jennifer H. Rearden, U.S.D.J.
Dated: September 9, 2024

Re: *Kristi Vuksanovich, et al. v. Airbus Americas, Inc., et al.*, 1:21-cv-03454-JHR

Dear Judge Rearden:

Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, the parties jointly seek leave to file their memoranda of law and exhibits in support of Defendants' Motion for Summary Judgment and the parties' motions pursuant to Rules 702-705 of the Federal Rules of Evidence and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579 (1993) under a provisional seal until October 18, 2024. The parties' motions discuss and cite to an extensive evidentiary record that includes numerous exhibits containing sensitive information, including Plaintiff Kristi Vuksanovich's medical information and the Airbus Defendants' sensitive commercial information. Given the large volume of exhibits attached to the motions, the parties intend to confer and mutually decide upon which information should be redacted or sealed under the standards set forth in Rule 9 of this Court's Individual Rules.

Accordingly, the parties seek permission to file their exhibits under a provisional seal until October 18, 2024. On that date, the parties will file public versions of their memoranda of law and exhibits, with the agreed-upon sealing of exhibits and/or redactions. Each party will be responsible for their own information, *i.e.*, Plaintiffs will propose sealing and redactions as to their own information, and Defendants will do the same for their information. The parties will accomplish this according to the following schedule:

- By September 20, 2024, the parties will each provide to the other side their proposal for the sealing of exhibits and/or redactions with respect to their own motions.

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- By October 11, 2024, the parties will each provide to the other side their proposal for the sealing of exhibits and/or redactions with respect to the opposing party's motions.
- By October 18, 2024, the parties will consolidate their proposals and file public versions of their memoranda of law and exhibits, with the agreed-upon sealing of exhibits and/or redactions.

Consistent with this Court's rules, the parties will also file by October 18 a letter motion explaining why the information should be redacted or sealed.

The parties appreciate the Court's consideration of this matter.

Respectfully submitted by:

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